



SACRAMENTO - SAN JOAQUIN
DELTA CONSERVANCY

CONSERVANCY BOARD

Mary Nejedly Piepho, Chair
Contra Costa County

Ken Vogel, Vice-Chair
San Joaquin County

Chuck Bonham
Appointed Public Member

Mike Eaton
Appointed Public Member

Darla L. Guenzler, PhD
Appointed Public Member

John Laird, Secretary
*California Natural Resources
Agency*

Ana Matosantos
*California Department of
Finance*

Jim Provenza
Yolo County

Dan Taylor
Appointed Public Member

Senator Lois Wolk
Ex-Officio Member

Eddie Woodruff
Solano County

Jimmie Yee
Sacramento County

LIAISON ADVISORS

Steve Chappell
*Suisun Resource
Conservation District*

Jessica Davenport
*San Francisco Bay
Conservation and
Development Commission*

Don Glaser
U.S. Bureau of Reclamation

Amy Hutzell
*California Coastal
Conservancy*

Robin Kulakow
Yolo Basin Foundation

Ren Lohfener
*U.S. Fish and Wildlife
Service*

Maria Rea
*National Marine
Fisheries Service*

Paul Robershotte
*U.S. Army Corps of
Engineers*

Michael Villines
*Central Valley Flood
Protection Board*

Mark Wilson
Delta Protection Commission

September 2, 2011

Via E-Mail

Honorable Don Nottoli, Chair
Delta Protection Commission
c/o Sacramento County
700 H Street, Room 2450
Sacramento, CA 95814

Mike Machado, Executive Director
Delta Protection Commission
14215 River Road
PO Box 530
Walnut Grove, CA 95690

**Re: Comments on the Public Draft of the Economic Sustainability Plan for the
Sacramento-San Joaquin Delta**

Dear Chair Nottoli and Mr. Machado:

We appreciate the opportunity to review and provide comment on the first public draft of the Economic Sustainability Plan ("ESP").

Conservancy staff recently met with several members of the ESP consultant team. From our perspective the meeting was very productive and as a result many of our initial comments were sufficiently addressed. The comments provided below are general in nature and should be construed to apply to the entire ESP unless otherwise indicated.

1. The Conservancy was born out of the same legislation, SBX7-1, that mandated the preparation of the ESP. However, there is no mention of the Conservancy's role, as mandated in our enabling legislation, in economic development and the promotion of recreation and tourism in the Delta. Specifically, the legislation states that the Conservancy shall "provide increased opportunities for recreation and tourism" (§32300(h)(3))
2. There are many instances in the ESP where "wildlife viewing activities and other ecologically based activities" are identified as recreation activities that are unlikely to generate significant increase in economic activity, relative to agricultural inputs. Other sections recognize increased ecosystem based tourism as one of the most important elements of increased economic activity in the Delta. Our concern is that the context of these statements is not sufficient to avoid confusion and may lead to a perception that the ESP is down-playing the very real contribution that these activities can make to the Delta economy.
3. There are several references to the need for an existing agency to be designated to manage and implement economic sustainability efforts in the Delta. The ESP recommends that the Delta Protection Commission consider filling this role. The Conservancy is in the process of completing its Strategic Plan. Through the Strategic Plan process the Conservancy, guided by input from local interests, will

define its role in promoting recreation and tourism in the Delta and provide a blueprint for such activity across the Delta. The statement (pg xiv) "The Delta Protection Commission should consider taking on this role" could be amended to read "The Delta Protection Commission should consider taking on this role in coordination with the Delta Conservancy".

4. Similarly to item 3 above, references to the Delta Improvement Fund throughout the ESP could be amended to include the Delta Conservancy Fund. The Delta Conservancy Fund was established by SBX7-1 and its funds shall be used to support the Conservancy's mandates including the promotion of recreation and tourism and efforts that "support the economic well-being of Delta residents".
5. The ESP clearly states that one of the constraints to increasing recreation and tourism in the Delta is the potential increase of instances of trespassing, vandalism, littering, etc. It has been the Conservancy's experience, in our interactions with Delta residents and local government, that underfunded and understaffed enforcement is a key driver in perceptions about increased recreation and tourism opportunities. The "Overview and Key Finding" section of Chapter 7 (pg 108) should be amended to include the critical issue of enforcement mechanisms and responsibilities in the Delta.
6. The description of the "five location-based strategies" (pg 108-109) should be amended to include the expansion of public access to both existing and planned natural habitat areas.

Again, thank you for the opportunity to review the ESP and provide comments. We will continue to be actively engaged in this process and look forward to the release of the next draft document.

Sincerely,



Campbell Ingram
Executive Officer

CC: Sacramento-San Joaquin Delta Conservancy Board